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June 18, 2018

VIA ECF AND FIRST CLASS MAIL

Honorable Victor Marrero
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: URGENT REQUEST FOR COURT INTERVENTION
Docket No.1:90-cv-05722-VM

Dear Hon. Marrero:

This office represents Union Members, Michael Donnelly and Peter Corrigan in connection with claims against the New York City District Council of Carpenters ("District Counsel") alleging violations of civil rights under various federal, state, city and local statutes promulgated to protect employees from adverse action taken against them as well as for claims arising during their employment as labor organizer and business agent, respectively.

As the Federal Independent Monitor (IM) reports to Your Honor regarding its assessment of the District Council's progress towards achieving the objectives of the Stipulation and Order and the Consent Decree, we write to Your Honor to urgently report violations arising from recent conduct committed by the current leadership of the District Council which the IM had been made fully aware and respectfully request a conference before Your Honor.

Because my client, Mr. Corrigan is still a member, although recently terminated as a business agent, we have legitimate concerns of retaliation made against Mr. Corrigan's continued membership, rights, and protections under the law. Mr. Corrigan on Wednesday June 13th put a motion on the floor for District Council's leadership, Joseph Geiger, Michael Cavanaugh, and Matthew Walker to resign from their respective positions with the District Council. Mr. Corrigan set forth that these individuals have deceived the United Brotherhood of Carpenters (UBC) Membership, the Delegate Body, the District Council Executive Board and the Council's employees regarding the investigation into and resignation of former Council President Steve McInnis. Various Members reported allegations of sexual harassment of a District

Council's female employee by Mr. McInnis to the IM's office months prior to the time frame indicated in the District Council's letter to the membership and the IM's Interim Report to your Honor advising of Mr. McInnis' resignation. The IM's investigation regarding these serious allegations against Mr. McInnis should have been properly and timely completed prior to the December 2017 election.

Mr. Corrigan put forth that "By concealing the allegations from the membership and not forcing an earlier investigation, Mr. Geiger, Mr. Cavanaugh, and Mr. Walker exposed the District Council to increased liability by allowing a hostile work environment to persist". These failures evidence negligence, misrepresentation and conflict of interest.

As a result, we respectfully request the Court's urgent intervention in this matter.

Thank you for your consideration in this matter.

Respectfully yours,

/s/

Donna H. Clancy

DHC/amc

Cc: **BY ECF**

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